

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
 )  
Inquiry Regarding Carrier Current Systems ) ET Docket No. 03-104  
Including Broadband over Power Line )  
Systems )

**REPLY COMMENTS TO NOI DOCKET 03-104**

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I'm a ham radio operator and shortwave radio listener who is very concerned about BPL as proposed by the utility concerns. In my earlier comment to the Commission, I've expressed my misgivings about BPL, including concerns of security, solar activity and mutual- and self-interference in and between BPL systems.

Other commenters, such as the ARRL, AMSAT, AMRAD, and Cortland Richmond, Jr., among others, have ably expressed their concerns, which I share. As an amateur radio operator I'm satisfied with the arguments that they've put forward to not relax Part 15 regulations until more open testing can be done.

I'm more concerned about BPL as a shortwave listener. Some systems are said to use adaptive algorithms that detect an outside transmitter, so if I keyed my HF transmitter, the system would adapt.

Shortwave listeners have no such feedback. There is no way that a BPL system could adapt to the shortwave listener who may be living, or listening, under the power lines. In the apartment complex in which I live, I am always close to a power line; in fact, the distribution transformer is only 20 feet from my window.

According to NASWA (North American Shortwave Association) in their filing, there are estimated to be 575 million broadcast receivers (presumably AM/FM) and 6 million shortwave receivers. BPL could make them **all** useless. One has to look no further than the HDTV debacle to know what happens when there is even the hint that someone's TV or radio may be made "obsolete".

The ARRL has urged designers of BPL systems, such as HomePlug, to include frequency notches to block the ham bands from their system. But no one has proposed notches for shortwave broadcasting.

As well, most if not all of the allocations in HF are determined on a worldwide basis by the ITU. A quote from the American Public Power Association reads:

"there should be an attempt to accommodate BPL, even if it means that existing communications providers may have to share or transfer bandwidth."

With due respect to the APPA, this is nonsense. What they are really doing is stealing the HF spectrum. Users of HF use those bands for amateur radio and broadcasting, but more importantly, for military and government communications. Would APPA consent to its members carrying the cost for all users of HF to transition to other modes of operation, none of which are as cost effective as HF. Will the APPA buy me a satellite radio? Some of the broadcasters I listen to aren't on XM. Some have estimated the spectrum relocation and conversion costs in the billions. I don't disagree.

Once again, I plead with the Commission to take account of **all** users of the radio spectrum that could be affected by BPL. **All** users, not merely those who can afford lobbyists. And please let technical concerns be your **first** priority in drafting your rules.

Respectfully submitted,

David Moisan